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Attorneys for Defendant and
Counterclaimant SKYRYSE, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT
ALIN PILKINGTON, MISOOK
KIM, and DOES NOS. 1-50,

Defendants.

Case No. 2:22-cv-09094-GW-MAR

**JOINT STIPULATION TO
CONTINUE PLAINTIFF AND
COUNTERDEFENDANT MOOG
INC.'S DEADLINE TO FILE
AMENDED TRADE SECRET
IDENTIFICATION**

Complaint Filed: March 7, 2022
Counterclaims Filed: January 30, 2023

District Judge: Hon. George H. Wu
Magistrate Judge: Hon. Margo A.
Rocconi

1 IT IS HEREBY STIPULATED by and between Plaintiff and Counter-
2 Defendant Moog Inc. (“Moog”) and Defendant and Counterclaimant Skyryse, Inc.
3 (“Skyryse”) (collectively, the “Parties”) through their respective attorneys of record,
4 as follows:

5 WHEREAS, on February 21, 2023, Moog served its Trade Secret
6 Identification (the “TSID”), filed with the Court at Dkts. 475-05, 475-06, and
7 475-09;

8 WHEREAS, on June 14, 2023, Magistrate Judge Rocconi issued an order
9 granting-in-part and denying-in-part Skyryse’s Motion to Enforce Order Compelling
10 Trade Secret Identification (the “TSID Order”), through which Skyryse had
11 challenged the sufficiency of Moog’s TSID (Dkt. 534);

12 WHEREAS, the TSID Order requires: 1) Moog to serve an amended trade
13 secret identification (the “Amended TSID”) on or before July 14, 2023; 2) Skyryse
14 to challenge the adequacy of Moog’s Amended TSID on or before August 4, 2023;
15 and 3) Moog to file on or before August 18, 2023 an opposition to Skyryse’s
16 challenge to the Amended TSID;

17 WHEREAS, on June 28, 2023, Skyryse filed with District Court Judge Wu
18 objections to and a motion for review of certain aspects of Magistrate Judge
19 Rocconi’s TSID Order, with a hearing noticed for August 24, 2023 (the
20 “Objections”) (Dkt. 555);

21 WHEREAS, the Court’s ruling on Skyryse’s Objections to the TSID Order
22 may impact the manner and timing in which Moog amends its TSID and in which
23 Skyryse may challenge the sufficiency of an amended TSID;

24 WHEREAS, the Parties seek to conserve judicial and party resources, and to
25 continue deadlines set by the TSID Order pending the Court’s review of the TSID
26 Order to avoid duplicative amendments and potential challenges to Moog’s TSID;
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1 NOW THEREFORE, subject to the Court's approval, the Parties stipulate
2 and agree as follows:

- 3 1. Moog's deadline to file its Amended TSID in response to the TSID
4 Order is continued from July 14, 2023 as follows:
- 5 a. if Judge Wu denies Skyrise's Objections, 7 days after Judge
6 Wu rules on Skyrise's Objections;
- 7 b. if Judge Wu sustains Skyrise's Objections, the date upon which
8 Judge Wu or Judge Rocconi orders Moog to file its Amended
9 TSID; or
- 10 c. if Judge Wu sustains Skyrise's Objections but does not provide
11 a date upon which Moog must file its Amended TSID, the
12 Parties shall confer on a date for Moog to file its Amended
13 TSID and if they are unable to reach a resolution, they shall file
14 a joint request with the Court to set a deadline for Moog to file
15 its Amended TSID.
- 16 2. Upon the filing of Moog's Amended TSID, the other procedures and
17 deadlines in the TSID Order shall remain in effect (including in
18 connection with any Skyrise challenge to Moog's Amended TSID,
19 and Moog's opposition thereto).
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1 **IT IS SO STIPULATED.**

2
3 Dated: July 7, 2023

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5 SHEPPARD, MULLIN, RICHTER &
6 HAMPTON LLP

7 By: /s/ Kazim A. Naqvi
8 Kazim A. Naqvi
9 Counsel for Plaintiff and Counterdefendant
10 Moog Inc.

11 LATHAM & WATKINS LLP

12 By: /s/ Gabriel S. Gross
13 Gabriel S. Gross
14 Counsel for Defendant and Counterclaimant
15 Skyrise, Inc.

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17 **ATTESTATION**

18 Pursuant to Civil Local Rule 5-4.3.4, I, Kazim A. Naqvi, attest that
19 concurrence in the filing of this document has been obtained by all its signatories.
20

21
22 Dated: July 7, 2023

/s/ Kazim A. Naqvi